## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re: Ex Parte Application of Republic of Kazakhstan for an Order to Obtain Discovery for Use in Foreign Proceedings Pursuant to 28 U.S.C. § 1782

Case No. 20-MC-167-JMF

## **NOTICE OF MOTION TO INTERVENE**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 24 and 45, Anatolie Stati, Gabriel Stati, Ascom Group, S.A., and Terra Raf Trans Traiding Ltd. ("Stati Parties" or "Intervenors") will respectfully move this Court for an order permitting Intervenors to intervene under Fed. R. Civ. P. 24(a)(2) and 24(b)(1) for the limited purpose of opposing the application of the Republic of Kazakhstan ("RoK") for an Order Under 28 U.S.C. § 1782.

Dated: New York, New York May 15, 2020

The motion to intervene is granted, substantially for the reasons stated in the memorandum of law. The Court reserves judgment on the merits pending ROK's reply, which is due by May 29, 2020. See ECF No. 15. The Clerk of Court is directed to terminate ECF No. 16. SO ORDERED.

May 19, 2020

Respectfully submitted,

/s/ James E. Berger

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